

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,

v.

JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.

CIVIL NO. 97-2459 (GAG)

DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT

TRIAL BY JURY IS HEREBY
REQUESTED

MOTION TO REQUEST AN ENLARGEMENT OF TIME TO
RESUBMIT ANSWERS TO INTERROGATORIES
AND REQUESTED DOCUMENTS

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. On April 15, 2005 this Honorable Court ordered plaintiff to resubmit and produce requested documents in ten (10) calendar days.
2. Plaintiff back on April 14, 1999 submitted to Defendant and to the Court all his 168 Exhibits for Trial and most of the requested documents are therein and that's why Plaintiff responded to many of the requested documents that the same were already provided. See Exhibit I.
3. Plaintiff never had the opportunity to confer with brother counsel for Defendants in accordance to Local Rule 26(b) to clarify any question arising from the answers. Should Defendants had comply with Local Rule 26(b) this issue have had been resolved.
4. Plaintiff followed this Honorable Court order dated April 27, 2004 (docket no. 207)

regarding Local Rule 26(b) in which it was ordered the following:

“The Defendant is granted the extension of time to produce discovery. In the future, Plaintiff counsel shall comply with the Local Rules regarding discovery matters.”

5. Plaintiff acted in good faith and respectfully requests an additional twenty (20) days to comply with the order of April 15, 2005. Defendant in its motion dated April 21, 2005 (docket no. 232) had no objection for additional time to submit complete and understandable answers to defendants' discovery requests”.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above and authorize the enlargement of time in the amount of twenty (20) calendar days to comply with the April 15, 2005.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on April 25th, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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